

EXHIBIT 1

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED)
4 STATES VIRGIN ISLANDS)

5 Plaintiff,)

6 vs.)

7 JPMORGAN CHASE BANK, N.A.,)

8 Defendant/Third-)
9 Party Plaintiff.)

10 JPMORGAN CHASE BANK, N.A.)

11 Third-Party)
12 Plaintiff,)

13 vs.)

14 JAMES EDWARD STALEY,)

15 Third-Party)
16 Defendant.)

17 FRIDAY, MAY 26, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 **CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER**

20 - - -

21 Videotaped deposition of James
22 Dimon, held at the offices of JPMorgan Chase,
23 383 Madison Avenue, New York, New York,
24 commencing at 9:02 a.m. Eastern, on the above
25 date, before Carrie A. Campbell, Registered
Diplomate Reporter and Certified Realtime
Reporter.

- - -

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deps@golkow.com

1 a deferred prosecution agreement is?

2 MR. BUTTS: Objection.

3 You may answer.

4 THE WITNESS: Generally, yes.

5 QUESTIONS BY MR. SULLIVAN:

6 Q. And that means that you
7 essentially plead guilty, but they don't do
8 anything except take your money for a number
9 of years. But if you do it again, it's
10 more -- they can prosecute you for the
11 original matter.

12 Do you understand that?

13 MR. BUTTS: Objection.

14 You may answer.

15 THE WITNESS: I'm not a lawyer,
16 but generally I understand it that
17 way, yes.

18 QUESTIONS BY MR. SULLIVAN:

19 Q. Most of us lawyers don't
20 understand it. It's what it is.

21 MR. SULLIVAN: Thank you, sir.

22 That's all I have.

23 MR. BUTTS: Thank you.

24 MR. SULLIVAN: Have a good day.

25 Nice holiday. I have to go. I have a

1 trial Monday. Take care.

2 MR. BUTTS: Sounds like no
3 holiday for you.

4 MS. FRIEDMAN: Should we take a
5 break?

6 MR. BUTTS: Yeah, let's do.

7 VIDEOGRAPHER: We're going off
8 record. The time is 10:30.

9 (Off the record at 10:30 a.m.)

10 VIDEOGRAPHER: We're going back
11 on record. The time is 10:39.

12 DIRECT EXAMINATION

13 QUESTIONS BY MS. SINGER:

14 Q. Good morning, Mr. Dimon. My
15 name is Linda Singer. I would like to say I
16 bring down the average age of the examiners
17 on our side, but I don't know that that's
18 true, actually, so I'm going to skip that.

19 I don't think we did this at
20 the outset, so could you state your position
21 for the record, please?

22 A. I am chairman and chief
23 executive officer of JPMorgan Chase.

24 Q. And where generally do you
25 reside?

1 A. New York City.

2 Q. And do you have any plans of
3 moving your residence between now and
4 November of 2023?

5 A. No.

6 Q. When did you first learn that
7 Jeffrey Epstein was a customer of JPMorgan?

8 A. I don't recall knowing anything
9 about Jeffrey Epstein until the stories broke
10 sometime in 2019. And I was surprised that I
11 didn't even -- had never even heard of the
12 guy, pretty much, and how involved he was
13 with so many people.

14 Q. Were you aware that Jeffrey
15 Epstein was promoting you to contacts as a
16 candidate for Secretary of the Treasury?

17 MR. BUTTS: Objection.

18 You may answer.

19 THE WITNESS: Nope.

20 QUESTIONS BY MS. SINGER:

21 Q. Were you aware that JPMorgan
22 entered into a settlement or settlements with
23 Jeffrey Epstein?

24 A. Not until recently, no.

25 Q. When did you learn that?

1 Q. And what did you rely on to
2 state that JPMorgan did not have
3 contemporaneous knowledge of Epstein's
4 offenses?

5 MR. BUTTS: Objection.

6 THE WITNESS: I didn't say
7 that.

8 QUESTIONS BY MS. SINGER:

9 Q. Okay. You did say hindsight is
10 fabulous, correct?

11 A. I did.

12 Q. Okay. So prior to your
13 interview, what information did you have
14 about what JPMorgan knew or didn't know about
15 Jeffrey Epstein and JPMorgan's handling of
16 his accounts?

17 MR. BUTTS: Objection. And
18 I'll instruct you not to answer to the
19 extent that any knowledge comes from
20 counsel.

21 THE WITNESS: I knew very
22 little about any of this until this
23 case was opened. And then of course
24 I've learned quite a bit since then.

25

1 QUESTIONS BY MS. SINGER:

2 Q. Okay. So in making your
3 comment that hindsight is fabulous, what
4 information had you reviewed about what
5 JPMorgan knew or didn't know about its
6 handling of Jeffrey Epstein's business?

7 MR. BUTTS: Objection.

8 And the same caution, you
9 should not reveal any information you
10 reviewed in the context of discussions
11 with counsel.

12 THE WITNESS: Well, I mean,
13 almost all of it was done in
14 consultation with counsel.

15 MR. BUTTS: Then you can't
16 answer the question.

17 THE WITNESS: Okay.

18 QUESTIONS BY MS. SINGER:

19 Q. Other than conversations with
20 your lawyers, which I never mean for you to
21 reveal, nor would Mr. Butts allow you, did
22 you have any knowledge of what JPMorgan had
23 done or knew about Jeffrey Epstein prior to
24 your interview with CNN?

25 MR. BUTTS: Objection.

1 You may answer.

2 THE WITNESS: I don't recall
3 the specific knowledge I had before I
4 sat down with counsel relating to
5 these lawsuits.

6 QUESTIONS BY MS. SINGER:

7 Q. And --

8 A. And that was after I sat down
9 with counsel.

10 MR. BUTTS: The interview was
11 after --

12 THE WITNESS: The interview was
13 after I spent considerable time with
14 counsel.

15 QUESTIONS BY MS. SINGER:

16 Q. And apart from your preparation
17 in connection with this litigation, how much
18 time have you spent personally looking at the
19 bank's conduct with respect to Jeffrey
20 Epstein?

21 MR. BUTTS: Objection to form.

22 THE WITNESS: Before these
23 lawsuits and the time with counsel,
24 very little.

25

1 A. No.

2 Q. Okay.

3 MR. BUTTS: Are you finished
4 with this document?

5 MS. SINGER: Yes, if y'all want
6 a break.

7 MR. BUTTS: Hold on. I think
8 it's been an hour. It's 11:40.
9 What's -- do you want --

10 THE WITNESS: I eat at 12, so
11 let's go right to -- let's wait until
12 12 to eat lunch.

13 MR. BUTTS: Yeah, there it is.

14 (Dimon Exhibit 11 marked for
15 identification.)

16 QUESTIONS BY MS. SINGER:

17 Q. Okay. All right. Let's go to
18 Exhibit 11, which is going to be
19 JPM-SDNYLIT-0006171.

20 All right. This document is an
21 e-mail between Jes Staley and Jeffrey
22 Epstein, correct?

23 A. Yes.

24 Q. Okay. And it's dated
25 August 30, 2009, at the very top, correct?

1 A. Yes.

2 Q. Prior to your preparation for
3 this deposition, had you seen this e-mail
4 before?

5 A. No.

6 Q. And if we go to the middle of
7 this e-mail, Jes Staley indicates to Jeffrey
8 Epstein, "Back in the saddle Monday in London
9 with Jamie mid-week."

10 Do you recall a trip to Jes
11 Staley -- a trip to London with Jes Staley in
12 August or September 2009?

13 A. Do I recall it, like, back
14 then, no, but as a part of preparing for
15 this. And my records are known, so you guys
16 can just check.

17 And I think I went there for a
18 big conference, not for Jes.

19 Q. Okay. But you don't have an
20 independent recollection of a trip to London
21 that Jes Staley was also on in August 2009,
22 correct?

23 A. Correct.

24 Q. Okay. At the top of the -- I'm
25 sorry. Towards the top of the e-mail,

1 Jeffrey Epstein asked Jes Staley, "How long
2 London? Do you need anything there?"

3 And Jes Staley responds, "Yep."

4 Have I read both of those
5 segments correctly?

6 A. Yes.

7 Q. Were you aware of this
8 interaction between -- I'm sorry. Were you
9 aware of -- I'm going to try one more time on
10 this one.

11 Are you currently aware of what
12 happened between Jeffrey Epstein and Jes
13 Staley with regards to this e-mail?

14 MR. BUTTS: And is the question
15 about your current awareness --

16 THE WITNESS: I'm neither
17 currently aware, nor was I back then.

18 QUESTIONS BY MS. SINGER:

19 Q. Okay. So you don't know what
20 this exchange refers to, do you?

21 MR. WOHLGEMUTH: Objection.

22 THE WITNESS: Who objected?

23 MR. BUTTS: That's -- that's --
24 that's right. You can answer the
25 question. That's Mr. Staley's

1 counsel.

2 THE WITNESS: Oh.

3 Repeat the question?

4 QUESTIONS BY MS. SINGER:

5 Q. Yes.

6 Do you have any understanding
7 of what this e-mail exchange between Jeffrey
8 Epstein and Jes Staley refers to?

9 MR. WOHLGEMUTH: Objection.

10 THE WITNESS: No.

11 QUESTIONS BY MS. SINGER:

12 Q. Were you aware of -- are you
13 currently -- are you currently aware that
14 Jeffrey Epstein transferred \$3,000 to a woman
15 named [REDACTED] on August 31st from Jeffrey
16 Epstein's account at JPMorgan?

17 MR. BUTTS: Objection. You
18 should not answer to the extent you're
19 revealing anything learned from
20 counsel.

21 THE WITNESS: I was not aware.

22 QUESTIONS BY MS. SINGER:

23 Q. When did you first learn of the
24 transfer that Jeffrey Epstein made to [REDACTED]?

25 MR. BUTTS: Same objection and

1 instruction.

2 THE WITNESS: Only after being
3 prepared for this.

4 QUESTIONS BY MS. SINGER:

5 Q. Okay. This wasn't -- and
6 you've since come to understand that Jeffrey
7 Epstein did make a transfer to a woman named
8 [REDACTED] around this time, correct?

9 MR. BUTTS: Objection.

10 And you may ask {sic} that
11 question based on your state of
12 knowledge prior to starting your
13 preparation for this deposition.

14 THE WITNESS: I do not know.

15 QUESTIONS BY MS. SINGER:

16 Q. Okay.

17 A. I don't know if it took place
18 or didn't take place or...

19 Q. Are you aware of other
20 transfers that Jeffrey Epstein made to women
21 from his JPMorgan accounts?

22 MR. BUTTS: Same objection and
23 instruction.

24 THE WITNESS: I was not aware.

25

1 QUESTIONS BY MS. SINGER:

2 Q. And at no point prior to 2019
3 did you become aware of Jeffrey Epstein's
4 payments to women from his JPMorgan accounts.

5 Is that correct?

6 A. I don't recall being aware, no.
7 And I don't know when I became aware of some
8 of it, so...

9 Q. Would you expect, in light of
10 Jeffrey Epstein's sex offenses, that JPMorgan
11 would pay special attention to payments he
12 was making to women?

13 MR. BUTTS: Objection. Form.

14 You may answer.

15 THE WITNESS: I would expect my
16 experts to review what they thought
17 was appropriate to review.

18 QUESTIONS BY MS. SINGER:

19 Q. And do you think that would
20 include for a sex offender like Jeffrey
21 Epstein paying for women -- paying women and
22 recruiters for sex, that that would include
23 review of his payments to women?

24 MR. BUTTS: Objection to form.

25 You may answer.

1 THE WITNESS: I would have
2 asked them to make sure they do proper
3 reviews of all things, yes.

4 QUESTIONS BY MS. SINGER:

5 Q. And sitting here today, do you
6 have an opinion as to whether that would
7 include -- do you have a view as to whether
8 that would include looking at his transfers
9 of money to women?

10 MR. BUTTS: Objection. And
11 objection to form.

12 You may answer.

13 THE WITNESS: My expectation
14 would be they would be looking at
15 things like that, among all of the
16 other things they looked at. And I
17 don't know if it was put in front of
18 the group. I don't know if they saw
19 it.

20 QUESTIONS BY MS. SINGER:

21 Q. And when you refer to "group"
22 in your response, you don't know if that was
23 put in front of the group, what do you mean
24 by "group"?

25 A. The people who review these

1 types of things.

2 Q. Compliance, regulatory, the
3 bankers --

4 A. Generally, yes.

5 Q. -- correct?

6 Okay. All right. On
7 September 1, 2009, Jes Staley became CEO of
8 JPMorgan's investment bank; is that right?

9 A. I'll accept the date from you.
10 Yeah. I don't know -- I don't remember the
11 exact date.

12 Q. Okay. But you do recall
13 somewhere around there, he became CEO of
14 JPMorgan's investment bank, correct?

15 A. Yes.

16 Q. And that was a change that you
17 directed, Mr. Dimon?

18 A. Yes.

19 Q. Why did you -- well, was it a
20 promotion?

21 A. I would say so, yes.

22 Q. Okay. And why did you direct
23 that change?

24 A. I had -- for a whole bunch of
25 reasons, I had to make a change. I wanted to

1 was -- had been a customer of the bank?

2 A. I don't recall specifically.

3 Q. Did somebody from the bank tell
4 you that?

5 A. Most likely my general counsel
6 right there.

7 Q. Now, when you found out that
8 this person had been a customer of the bank
9 and you found out that he had been engaged in
10 this sex trafficking, did you, in your
11 capacity as chief executive officer and
12 chairman of the bank, try to find out what
13 the facts had been concerning the bank's
14 relationship to Mr. Epstein?

15 MR. BUTTS: Objection to form.

16 And for the moment, I'll let
17 you do a yes -- a yes or no answer to
18 the question.

19 THE WITNESS: What is the
20 question again?

21 QUESTIONS BY MR. BOIES:

22 Q. After you found out that
23 Jeffrey Epstein existed, that he'd been a sex
24 trafficker and he'd been a customer of the
25 bank, did you, in your capacity as CEO and

1 chairman, want to find out what the
2 circumstances were concerning the bank's
3 relationship to this man?

4 MS. FRIEDMAN: Can I just -- I
5 just want to make sure of privilege.

6 THE WITNESS: This is
7 privileged, yeah. I can --

8 MS. FRIEDMAN: Just give me a
9 minute.

10 MR. BUTTS: Okay. Yeah, so you
11 should not reveal anything you learned
12 or -- in connection with Ms. Friedman,
13 her staff or outside counsel.

14 THE WITNESS: Okay. What --

15 MR. BOIES: Remember, all I
16 asked him is whether he wanted to find
17 out. It's a yes or no question.

18 MR. BUTTS: Okay. I'll give
19 you that yes or no. That's fine.

20 MS. FRIEDMAN: We're fine.

21 THE WITNESS: The protocol,
22 what I did, was I asked my general
23 counsel there, do what you got to do.
24 Do everything.

25 It wasn't about whether I had

1 personal knowledge. It was about
2 whether we, the company, were doing
3 the right things.

4 MR. BUTTS: Okay.

5 THE WITNESS: And then after
6 that, she did give me some of that
7 information I didn't have before.

8 QUESTIONS BY MR. BOIES:

9 Q. In order to determine whether
10 the company was, in your words, doing the
11 right thing, did you, as chairman and chief
12 executive officer, want to know what the
13 facts were?

14 MR. BUTTS: Did you want to
15 know what the facts were.

16 THE WITNESS: Did I want to
17 know?

18 I wanted to know what I should
19 know. I didn't spend hours and hours
20 going through "the facts."

21 QUESTIONS BY MR. BOIES:

22 Q. Well, when you say you wanted
23 to know what you should know, what did you
24 think you should know?

25 A. That the company was properly

1 working with law enforcement, that we should
2 look -- that we should make sure that it's in
3 the general counsel's court and not somewhere
4 in the bowels of the company, and if there
5 were lessons learned, we should deploy those,
6 too.

7 Q. Okay. Now, in terms of lessons
8 learned and deploying those lessons, did you
9 make an attempt to find out whether there
10 were lessons to have been learned from this
11 experience that would change your business
12 practices?

13 A. Well, we're still in the
14 process because we're obviously -- I'm being
15 distracted doing this today, but I have never
16 in my life not experienced a thing where you
17 don't learn lessons and try to do better in
18 the future than you did in the past.

19 Q. I agree with that.

20 And what did you do -- and
21 again, I'm not asking you about what you did
22 in this litigation and what you did for this
23 litigation.

24 I'm simply asking, what did you
25 do for your business? What did you do as

1 MR. BUTTS: Objection. Asked
2 and answered.

3 THE WITNESS: I want you to
4 review controls at banks around the
5 world, other people, what we've done
6 and haven't done, best practices, what
7 we're allowed to do, what we're not
8 allowed to do. And when you're ready,
9 Stacey, come back to me and talk to me
10 about it. Have other people in the
11 room that would be happy to do it.

12 QUESTIONS BY MR. BOIES:

13 Q. When did you --

14 A. It's called delegation. I
15 can't do that myself.

16 Q. Okay. When did you first ask
17 your general counsel to begin this project of
18 identifying best practices and how you could
19 improve controls?

20 A. Well, we've been doing it my
21 whole career when it comes to multiple
22 things, including AML. The laws change, the
23 requirements change, the regulations change.

24 About this particular matter?
25 About anything relating to the human

1 trafficking? I think that came up because of
2 this case.

3 Q. And this case was filed a few
4 months ago; is that correct?

5 MR. BUTTS: Objection.

6 THE WITNESS: I meant it came
7 up as a result of the Epstein
8 indictment, suicide.

9 QUESTIONS BY MR. BOIES:

10 Q. Okay. Now, focusing on what
11 you did before this litigation was filed,
12 before the litigation was filed against Chase
13 Bank, before that litigation was filed, were
14 you concerned that the bank had any legal
15 liability for what happened?

16 MR. BUTTS: Objection.

17 And you should not reveal any
18 information or view you had based on
19 discussions with counsel.

20 MR. BOIES: This is still just
21 a yes or no question.

22 MR. BUTTS: It was not a yes or
23 no question. You asked him about
24 concern about legal liability.

25 MR. BOIES: Well, I said did he

1 identification.)

2 QUESTIONS BY MR. BOIES:

3 Q. Let me ask you to look at a
4 document that has been previously marked as
5 Exhibit 114.

6 And the e-mail I'm interested
7 in is the e-mail at the top which is from
8 Paul Morris to Jeffrey Epstein, dated
9 June 30, 2012, at 1:49 a.m.

10 Do you see that e-mail?

11 A. Yes.

12 Q. And it's a short e-mail, and
13 I'll just read it for the record.

14 "Jeffrey, sorry for being so
15 limited on the e-mails, but I guess I'm too
16 discrete. Anyway, I really appreciate
17 everything you're doing, and this is a
18 fantastic opportunity that you are opening
19 the door to. I briefed our CEO, and I think
20 he will get a sense of the LB relationship
21 over the weekend. Come back to you ASAP, and
22 thank you again. Paul Morris, JPMorgan
23 private bank."

24 Did Mr. Epstein help JPMorgan
25 develop a relationship with Leon Black?

1 MR. BUTTS: Objection.

2 You may answer.

3 THE WITNESS: I don't know if
4 that's what LB refers to.

5 We've -- I've known Leon Black
6 for -- way before this, and the
7 company has been doing business with
8 Apollo for a long time. So we didn't
9 need his introduction.

10 QUESTIONS BY MR. BOIES:

11 Q. You know Mr. Black?

12 A. I do know Mr. Black.

13 Q. Have you --

14 A. This could have been Limited
15 Brands, and the CEO was unlikely not me --
16 was likely not me.

17 MR. BUTTS: The testimony has
18 been it's not you.

19 THE WITNESS: Right.

20 QUESTIONS BY MR. BOIES:

21 Q. Did you ever discuss
22 Mr. Epstein with Mr. Black?

23 A. No.

24 Q. When was the last time you
25 talked to Mr. Black?

1 (Dimon Exhibit 101 marked for
2 identification.)

3 QUESTIONS BY MR. BOIES:

4 Q. I'm going to ask you to look
5 next at Exhibit 104 -- 101.

6 This is an exchange of e-mails
7 between Mr. Staley and Mr. Epstein on
8 June 17, 2009.

9 Mr. Epstein writes Mr. Staley.
10 "Peter will be staying at 71st Street over
11 the weekend. Do you want to organize either
12 you, or you and Jamie, quietly? Up to you."

13 Do you see that?

14 A. Yes.

15 Q. Did you meet with Mr. Epstein
16 and/or Mr. Staley at 71st Street over the
17 weekend?

18 A. Absolutely not.

19 Q. Do you know what Mr. Epstein is
20 referring to here?

21 A. I think I've testified many
22 times, I didn't know Jeff Epstein. I never
23 met Jeff Epstein. I never went to his house.
24 I never went to his island. And I do not
25 know exactly what he's referring to here.

1 Maybe -- I mean, I can surmise
2 that he wanted Jes to introduce me to him --
3 introduce me to him.

4 Q. Now, Mr. Staley responds the
5 next day to Mr. Epstein, saying, "Jamie is in
6 Asia. I just got back from London, and I'm
7 in Boston. Let me what's up for the weekend.
8 If I'm in the city, for sure."

9 Do you have any explanation as
10 to why Mr. Staley would write that e-mail if
11 you had no contact at all with Mr. Epstein?

12 MR. BUTTS: Objection.

13 MR. WOHLGEMUTH: Objection.

14 MR. BUTTS: You may answer.

15 THE WITNESS: I have no idea.

16 (Dimon Exhibit 102 marked for
17 identification.)

18 QUESTIONS BY MR. BOIES:

19 Q. Let me ask you look -- to look
20 next at the document that's been previously
21 marked as Exhibit 102.

22 And do you know who Lesley
23 Groff is, by any chance?

24 A. Not that I can recall.

25 Q. Have you seen her mentioned in

1 connection with Mr. Epstein?

2 A. No.

3 Q. Are you aware of whether or not
4 she worked for Mr. Epstein?

5 A. Nope.

6 Q. On February 26, 2010, Lesley
7 Groff writes Mr. Epstein on the subject of
8 Peter, Jes and Jamie. "Shall I have Lynn
9 prepare heavy snacks for your evening
10 appointments with Peter Mandelson, Jes Staley
11 and Jamie Dimon? Or is this to be a nice,
12 sit-down dinner at 9 p.m.?"

13 And Mr. Epstein replies,
14 "Snacks."

15 Do you see that?

16 A. Yes.

17 Q. Did you in fact have an
18 appointment with Peter Mandelson, Jes Staley
19 and Jamie Dimon?

20 A. I have never had an appointment
21 with Jeff Epstein. I've never met Jeff
22 Epstein. I never knew Jeff Epstein. I never
23 went to Jeff Epstein's house. I never had a
24 meal with Jeff Epstein. I have no idea what
25 they're referring to here.

1 I did know Peter Mandelson, and
2 obviously I knew Jes.

3 Q. Do you have an explanation why
4 Lesley Groff would have written this e-mail?

5 MR. BUTTS: Objection.

6 You may answer.

7 THE WITNESS: Likely
8 misinformed. Not likely.

9 Misinformed.

10 QUESTIONS BY MR. BOIES:

11 Q. Now, Mr. Epstein does not write
12 back to her saying, you're misinformed, Jamie
13 Dimon is not coming.

14 You see that?

15 A. I don't know what he thought at
16 the time. He was obviously misinformed. I
17 never -- this never took place.

18 Q. Okay. Did Mr. Epstein arrange
19 for you to meet with Ehud Barak?

20 A. Who?

21 MR. BUTTS: Objection.

22 You may answer.

23 THE WITNESS: Who?

24 QUESTIONS BY MR. BOIES:

25 Q. Ehud Barak.

1 A. I don't think Jeff Epstein ever
2 arranged for me to meet with anybody, to my
3 knowledge. And I knew Ehud Barak. We did
4 not need introductions to anybody.

5 (Dimon Exhibit 113 marked for
6 identification.)

7 QUESTIONS BY MR. BOIES:

8 Q. Let me ask you to look at a
9 document that has been previously marked as
10 Exhibit 113.

11 This is a series of e-mails.
12 The one at the bottom, January 23, 2008, at
13 12:44 p.m., says, "Hello Rosa, I think [REDACTED]
14 may have already e-mailed you, but wanted to
15 follow up just in case. Jeffrey was talking
16 to me on the phone and to [REDACTED] who was
17 standing with him at the same time, so not
18 sure which one of us was actually to e-mail
19 you. Jeffrey requested that we give you the
20 contact e-mail for Ehud Barak so that you
21 could organize the meeting with Jamie Dimon
22 and Barak on your end for simplification."

23 And then Rosa writes to Jes
24 Staley, "Jes, is it okay for me to contact
25 Ehud Barak directly to arrange a meeting with

1 Is that not right?

2 A. That's what it lists. I don't
3 know if it's true.

4 (Dimon Exhibit 22 marked for
5 identification.)

6 QUESTIONS BY MS. SINGER:

7 Q. Okay. We're also going to take
8 a look at Exhibit 22, JPM-SDNYLIT-00150148_R.

9 Do you recognize Project Jeep,
10 Mr. Dimon?

11 A. I do not.

12 Q. Okay. So this document is
13 headed "Project Jeep - Client Review October
14 2019."

15 Correct?

16 A. Yes.

17 Q. And have you seen this document
18 before?

19 A. No.

20 Q. At the top --

21 A. Not that I recall.

22 Q. Okay. At the top, it indicates
23 that it is reviewing three client
24 relationships related to Jeffrey Epstein
25 media.

1 Correct?

2 A. Yes.

3 Q. Okay. And one of those, if you
4 look about a third of the way down, is Leon
5 Black, correct?

6 A. Yes.

7 Q. And if we turn to the second
8 page, Bates number 148, you can see that the
9 Leon Black relationship assets are valued at,
10 when you add them together, \$465 million.

11 Is that correct?

12 A. That's what this says.

13 Q. And do you have any independent
14 knowledge of the value of Leon Black's assets
15 at JPMorgan in 2019?

16 A. I don't.

17 Q. Okay. You can put that one
18 aside, please.

19 We saw on JPMorgan's privilege
20 log for this deposition an October 4, 2019
21 e-mail to you about Project Yellow.

22 Are you familiar with Project
23 Yellow?

24 A. Not that I recall.

25 Q. Okay. You don't have any sense

1 A. Or what came out with Epstein
2 before.

3 Q. So prior to 2015, were you
4 aware of efforts at JPMorgan to launch a
5 donor-advised fund with Bill Gates through
6 The Gates Foundation?

7 A. I don't -- I was not, no.

8 Q. Okay. So I take it you also
9 were not aware that Jeffrey Epstein played a
10 role in those discussions?

11 MR. BUTTS: Objection.

12 You may answer.

13 THE WITNESS: Oh, absolutely I
14 was not aware. Nor do we need Jeff
15 Epstein to talk to Bill Gates.

16 QUESTIONS BY MS. SINGER:

17 Q. Were you aware that Mary Erdoes
18 and Jes Staley had regular communications
19 with Jeffrey Epstein about that donor-advised
20 fund?

21 A. I am now.

22 MR. BUTTS: Objection.

23 QUESTIONS BY MS. SINGER:

24 Q. And were you aware that the
25 hope was that donor-advised fund would reach

1 see," tomorrow, "TMR what is the extent of
2 damage."

3 Do you have any recollection of
4 Mary Erdoes arranging for you to invite Bill
5 Gates to an event?

6 MR. BUTTS: Objection.

7 You may answer.

8 THE WITNESS: I don't recall
9 the specific event. That happened
10 typically, yes.

11 QUESTIONS BY MS. SINGER:

12 Q. Okay. Do you know Ace
13 Greenberg?

14 A. I did. He's dead.

15 Q. I should have asked it in the
16 past tense. I'm sorry.

17 And who did you know him to be?

18 A. The chairman of Bear Stearns.
19 And then when we bought Bear Stearns, he came
20 over as an investment advisor.

21 Q. Okay. And you know him
22 personally, or you knew him personally, I
23 take it?

24 A. For 40 years.

25 Q. I'm sorry.

1 Did Ace Greenberg ever talk to
2 you about his desire that JPMorgan retain
3 Jeffrey Epstein as a client of the bank?

4 A. He did not.

5 Q. Okay. You've talked a little
6 bit about Jes Staley's departure from
7 JPMorgan and the terms and tenor of his
8 departure.

9 Is one of the reasons for Jes
10 Staley's departure from JPMorgan your
11 understanding that Mr. Staley had made
12 unauthorized statements to the press about
13 the London Whale?

14 MR. BUTTS: Objection.

15 You may answer.

16 THE WITNESS: That was a part
17 of it.

18 QUESTIONS BY MS. SINGER:

19 Q. And what were those statements,
20 to your understanding?

21 MR. BUTTS: Objection.

22 You may answer.

23 THE WITNESS: I don't recall
24 specifically today.

25